

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JUSTIN PULLIAM,

Plaintiff,

v.

Civil Action No. 4:22-cv-4210

COUNTY OF FORT BEND, TEXAS;
SHERIFF ERIC FAGAN, in his
individual capacity; OFFICER ROBERT
HARTFIELD, in his individual capacity;
OFFICER JONATHAN GARCIA, in his
individual capacity; OFFICER TAYLOR
ROLLINS, in his individual capacity; and
OFFICER RICKY RODRIGUEZ, in his
individual capacity,

Defendants.

**PLAINTIFF’S UNOPPOSED MOTION TO DISMISS THE CLAIMS
AGAINST DEFENDANTS JONATHAN GARCIA AND RICKY
RODRIGUEZ WITH PREJUDICE**

Plaintiff Justin Pulliam respectfully requests this Court to dismiss the claims against Defendants Officer Jonathan Garcia and Officer Ricky Rodriguez with prejudice. Plaintiff’s counsel conferred with Defendants’ counsel, and he does not oppose this motion.

If the Court grants this motion, then the remaining Defendants will be County of Fort Bend, Texas; Sheriff Eric Fagan, in his individual capacity; Officer Robert

Hartfield, in his individual capacity; and Officer Taylor Rollins, in his individual capacity.

Dated: September 14, 2023

Respectfully submitted,

/s/ Christen Mason Hebert

Christen Mason Hebert, Attorney-in-Charge

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Attorneys for Plaintiff

**Admitted pro hac vice*

CERTIFICATE OF CONFERENCE

As required by Local Rule 7.1(D)(1), I certify to the Court that Plaintiff's counsel conferred with opposing counsel about the merits of this motion on September 13, 2023, and opposing counsel has indicated that he does not oppose this motion.

/s/ Christen Mason Hebert

Christen Mason Hebert, Attorney-in-Charge

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2023, I electronically filed the foregoing motion with the Clerk of Court using the CM/ECF system and served by the CM/ECF system to all counsel of record.

/s/ Christen Mason Hebert

Christen Mason Hebert, Attorney-in-Charge

Attorney for Plaintiff